

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DWAINE TAYLOR,
Plaintiff,

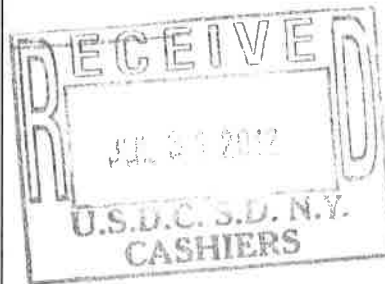
-against-

CITY OF NEW YORK; NEW YORK CITY
DEPARTMENT OF CORRECTION ("DOC")
SUPERVISING WARDEN ARTHUR
OLIVARI; CHIEF OF DEPARTMENT
LARRY W. DAVIS, SR.; CHIEF OF
DEPARTMENT MICHAEL HOURIHANE;
WARDEN WILLIAM CLEMONS; DEPUTY
WARDEN TURHAM GUMUSDERE;
ASSISTANT DEPUTY WARDEN
EXECUTIVE OFFICER AT BXDC
JACQUELINE BRANTLEY and
CORRECTION OFFICER JOHN DOES #1-#7,
Defendants.

12 CV 5881

RELATED CASE
STATEMENT

ECF CASE



Plaintiff, by and through his attorneys, submits this Related Case Statement pursuant to Rule 1.6(a) of the Local Rules of this Court. This case is related to a case pending in Southern District of New York entitled *Kadeem John v. City of New York, et al.*, 11-cv-5610(RPP), which was filed on August 12, 2011 and is assigned to the Honorable Robert P. Patterson.

Like *John*, this case involves Department of Correction ("DOC") officials turning a blind eye to, and condoning, inmate-on-inmate violence and gang control of New York City jails (including specifically, at the Robert N. Davoren Complex ("RNDC"), the principal City jail for adolescent males) as part of a practice known as "the Program." Like the plaintiff in *John*, the plaintiff in this case, Mr. Taylor, was a victim of "the Program" when he was brutally assaulted—twice—by members of the Bloods gang, while correction officers stood by and did nothing to prevent or stop the

assaults. This case also involves the same jail (RNDC) and the same counsel (Corporation Counsel, Legal Aid Society, and Emery Celli Brinckerhoff & Abady LLP) as in *John*, and will require discovery into the same policies and practices as *John*, namely “the Program.”

Dated: July 31, 2012
New York, New York

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